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474 Casey Court
Benicia, CA 94510

October 29, 2001

California Environmental Protection Agency
Department of Toxic Substances Control
Northern California – Office of Military Facilities
8800 Cal Center Drive
Sacramento, CA 95826-3200
Contact: Jim Austreng

Dear Mr. Austreng:

I offer my comments on the Draft Environmental Impact Report, Tourtelot Remediation/Cleanup Project, Benicia, California.

Reference ES-5 and Section 3.2.5.1: Minimum Separation Distance (MSD) is not needed for surface clearance activities. Since the Project Area was cordoned off a few years ago, periodically Pacific Bay has cleared vegetation using hand-held weed-trimmers without incident. No residents need to withdraw during the surface clearance phase.

D-1

Reference ES-11, Areas of Controversy: Where does the DEIR address these listed areas of controversy? Add the following to the list: Why was the project boundary chosen? Why does the project boundary include areas not leased/employed by DOD?

D-2

D-3

Reference ES-31, Impact 15-3: Should be expanded to state, "Short-term Inconvenience, loss of income, and additional costs to residents from temporary withdrawal." Many residents work at home. Withdrawal means loss of income. Residents may need to take off time from regular employment to handle children after school with a resulting loss of income. Lack of access to kitchen cooking facilities, laundry facilities, and such will involve additional out-of-pocket expenses for families temporarily displaced.

D-4

Reference ES-31, Mitigation Measures:

1. Make withdrawal voluntary for residents whose property is located 200 feet or more from DOD leased property (rather than the project boundary) as there is a markedly lower risk of OE or OE scrap on the non-DOD leased areas.
2. Shorten the time for the MSD withdrawal; i.e. allow residents to return home at 2 PM to allow students access to their homes after school.

D-5

3. Allow residents to return home from the temporary withdrawal at a pre-designated lunch period to care for animals and handle other domestic affairs.
4. Provide stipend to residents to cover out-of-pocket expenses.

D-5
Cont.

Reference page 2-15, the paragraph discussing the final site conceptual model should include this statement: "If DTSC determines from the final site conceptual model data that no OE was distributed to residential areas outside the Project Site boundary, then residents of these areas will be notified that there is no significant risk from OE on their properties."

D-6

Reference page 3-13, Section 3.2.5.1: The MSD appears to have been calculated based upon damage/risk to property or unprotected individuals. If residents were allowed a voluntary withdrawal, instead of mandatory, with a requirement to stay inside their homes or cars (when leaving the home), the home itself would provide shelter in the case of the accidental detonation. This voluntary withdrawal option should be considered, also, for those residences that are not located within 200 feet of the DOD leased land boundary. The MSD calculation does not take into effect the difference between the Project Area located adjacent to the DOD leased land and the Project Area located away from DOD leased land. Note the earlier comments regarding the determination of the Project Area boundary.

D-7

Reference page 3-18, Figure 3-4: This figure shows a typical daily MSD, which would potentially affect 32 residences in one day. Closing streets will leave the residents of Hugh Court no access to their homes. Work should be accomplished in daily blocks to minimize the MSD withdrawal area. Instead of this large work area depicted, crews should begin at the resident property line and work away from it to impact six or fewer residences per day.

D-8

Reference page 3-19, Section 3.2.5.3: The Hospitality Center should have bathroom/shower/clothes changing areas available for residents to prepare for work, school, and after-school activities.

D-9

Sincerely,

Diane P. Rieschick